

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Richard Dutton

(b) County of Residence of First Listed Plaintiff Granville
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)
Edward S. Shensky, Esq., Stark & Stark, P.C.
777 Township Line Road, Ste. 120, Yardley PA 19067
267-907-9600

DEFENDANTS

Remed Recovery Care Centers, LLC d/b/a Remed; Remed Realty Holdings, LLC d/b/a Remed; and Remed Realty LP General Partner, LLC, general partner of Remed Realty, LP

County of Residence of First Listed Defendant Chester
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff
- ☐ 3 Federal Question (U.S. Government Not a Party)
- ☐ 2 U.S. Government Defendant
- ☒ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- | | PTF | DEF | | PTF | DEF |
|---|---------------------------------------|----------------------------|---|----------------------------|---------------------------------------|
| Citizen of This State | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State | <input type="checkbox"/> 4 | <input checked="" type="checkbox"/> 4 |
| Citizen of Another State | <input checked="" type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input checked="" type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
- ☐ 2 Removed from State Court
- ☐ 3 Remanded from Appellate Court
- ☐ 4 Reinstated or Reopened
- ☐ 5 Transferred from Another District (specify)
- ☐ 6 Multidistrict Litigation - Transfer
- ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

28 U.S.C. Sec. 1332

Brief description of cause:

MVA claim, parties are from different states

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☒ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

FEB 19 2019

DATE

02/15/2019

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

CASE MANAGEMENT TRACK DESIGNATION FORM

Richard Dutton :
Learning Services Neurobehavioral Institute :
v. :
Remed Recovery Care Centers, LLC d/b/a :
Remed, (see attached Caption) :

CIVIL ACTION

NO.

19 725

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a Case Management Track Designation Form specifying the track to which that defendant believes the case should be assigned.

SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:

- (a) Habeas Corpus – Cases brought under 28 U.S.C. § 2241 through § 2255. ()
- (b) Social Security – Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ()
- (c) Arbitration – Cases required to be designated for arbitration under Local Civil Rule 53.2. ()
- (d) Asbestos – Cases involving claims for personal injury or property damage from exposure to asbestos. ()
- (e) Special Management – Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.)
- (f) Standard Management – Cases that do not fall into any one of the other tracks. (X)

2/15/19
Date

Edward S. Shensky
Attorney-at-law

Plaintiff Edward S. Shensky
Attorney for

267-907-9600

267-907-9659

eshensky@stark-stark.com

Telephone

FAX Number

E-Mail Address

FEB 19 2019

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DESIGNATION FORM

(to be used by counsel or pro se plaintiff to indicate the category of the case for the purpose of assignment to the appropriate judicial officer)

Address of Plaintiff: 796 Recovery Road, Creedmoor, North Carolina, 27522

Address of Defendant: 16 Industrial Boulevard, Suite 203, Paoli, Pennsylvania 19301

Place of Accident, Incident or Transaction: Paoli, Pennsylvania

RELATED CASE, IF ANY:

Case Number: _____ Judge: _____ Date Terminated: _____

Civil cases are deemed related when *Yes* is answered to any of the following questions:

- | | | |
|--|------------------------------|--|
| 1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 3. Does this case involve the validity or infringement of a patent already in suit or any earlier numbered case pending or within one year previously terminated action of this court? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 4. Is this case a second or successive habeas corpus, social security appeal, or pro se civil rights case filed by the same individual? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

I certify that, to my knowledge, the within case ☐ is / ☒ is not related to any case now pending or within one year previously terminated action in this court except as noted above.DATE: 02/15/2019Edward S. Shensky
Attorney-at-Law / Pro Se Plaintiff

27891

Attorney I.D. # (if applicable)

CIVIL: (Place a ☒ in one category only)

A. Federal Question Cases:

- ☐ 1. Indemnity Contract, Marine Contract, and All Other Contracts
- ☐ 2. FELA
- ☐ 3. Jones Act-Personal Injury
- ☐ 4. Antitrust
- ☐ 5. Patent
- ☐ 6. Labor-Management Relations
- ☐ 7. Civil Rights
- ☐ 8. Habeas Corpus
- ☐ 9. Securities Act(s) Cases
- ☐ 10. Social Security Review Cases
- ☐ 11. All other Federal Question Cases

(Please specify): _____

B. Diversity Jurisdiction Cases:

- ☐ 1. Insurance Contract and Other Contracts
- ☐ 2. Airplane Personal Injury
- ☒ 3. Assault, Defamation
- ☒ 4. Marine Personal Injury
- ☒ 5. Motor Vehicle Personal Injury
- ☐ 6. Other Personal Injury (Please specify): _____
- ☐ 7. Products Liability
- ☒ 8. Products Liability - Asbestos
- ☐ 9. All other Diversity Cases

(Please specify): _____

ARBITRATION CERTIFICATION

(The effect of this certification is to remove the case from eligibility for arbitration.)

Edward S. Shensky

counsel of record or pro se plaintiff, do hereby certify:



Pursuant to Local Civil Rule 53.2, § 3(c) (2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs:



Relief other than monetary damages is sought.

FEB 19 2019

DATE: 02/15/2019Edward S. Shensky
Attorney-at-Law / Pro Se Plaintiff

27891

Attorney I.D. # (if applicable)

NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

4400

JHS

1

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

RICHARD DUTTON : CIVIL ACTION
Learning Services Neurobehavioral Institute :
796 Recovery Road :
Creedmoor, North Carolina 27522 :

19 725

vs. :

REMED RECOVERY CARE CENTERS, :
LLC d/b/a REMED :
16 Industrial Boulevard, Suite 203 :
Paoli, Pennsylvania 19301 :

and :

REMED REALTY HOLDINGS, LLC, :
d/b/a REMED :
16 Industrial Boulevard, Suite 203 :
Paoli, Pennsylvania 19301 :

and :

REMED REALTY LP GENERAL :
PARTNER, LLC, general partner of :
REMED REALTY, LP :
c/o National Registered Agents, Inc. :
600 N. 2nd Street – Suite 401 :
Harrisburg, Pennsylvania 17101 :

FILED
FEB 19 2019
KAY DEPLIANN, Clerk
By

COMPLAINT AND JURY DEMAND

NOW COMES Plaintiff, Richard Dutton, by and through his attorney, Stark & Stark, and
in his complaint against defendants, states as follows:

Parties

1. Plaintiff Richard Dutton is an adult individual and resident of the State of North
Carolina who resides at Learning Services Neurobehavioral Institute, 796 Recovery Road,
Creedmoor, North Carolina.

2. On July 27, 2018, plaintiff designated Gary Lee as his agent and power of attorney in accordance with the Uniform Power of Attorney Act, Ch. 32C of the General Statutes of North Carolina.

3. Gary Lee is an adult individual, the nephew of the plaintiff, and resides at 206 W. Dogwood Drive, Creedmoor, North Carolina 27522.

4. Defendant ReMed Recovery Centers, LLC is a limited liability company organized and existing under the laws of the Commonwealth of Pennsylvania doing business as ReMed with a place of business at 16 Industrial Boulevard, Suite 203, Paoli, Pennsylvania 19301.

5. Defendant ReMed Realty Holdings, LLC is a limited liability company organized and existing under the laws of the Commonwealth of Pennsylvania doing business as ReMed with a place of business at 16 Industrial Boulevard, Suite 203, Paoli, Pennsylvania 19301.

6. ReMed Realty, LP, is a business entity qualified to do business in the Commonwealth of Pennsylvania, whose general partner, ReMed Realty LP General Partner, LLC, is a Delaware limited liability company with a Pennsylvania registered office in care of National Registered Agents, Inc., 600 N 2nd Street, Suite 401, Harrisburg, Dauphin County, Harrisburg, Pennsylvania 17101-1071 doing business as ReMed.

Jurisdiction and Venue

7. Jurisdiction is invoked pursuant to 29 U.S.C. sec 1332, based upon diversity of citizenship, and the matter in controversy exceeds, exclusive of interest and costs the sum of \$150,000.00 (one hundred fifty thousand dollars).

8. Venue is proper within the United States District Court for the Eastern District of Pennsylvania pursuant to 28 U.S.C. sec 1391, since the site of the underlying negligence occurred in Chester County, Pennsylvania, which is located in the Eastern District.

Facts

9. At all times material to plaintiff's cause of action, ReMed defendants operated a business providing rehabilitation and supported living services to adult persons with disabilities.

10. At all times material to plaintiff's cause of action, plaintiff was living in a community residence apartment on defendants' ReMed campus, located in Paoli, Pennsylvania, and was receiving services, including transportation from ReMed.

11. At all times material to plaintiff's cause of action, plaintiff had the following diagnoses and conditions: traumatic brain injury; post-seizure disorder; left leg below-the-knee amputation; mood instability; poor hearing left ear; Type II Diabetes; hypertension; hyperlipidemia; and chronic renal disease.

12. All of the acts alleged to have been done or not to have been done by the defendant were done or not done by the defendants, its agents, servants, workmen and/or employees acting within the course and scope of their employment and authority for and on behalf of said defendant.

13. Upon information and belief on March 5, 2017, plaintiff was being transported by defendant's employees in a vehicle owned and maintained by defendant, and operated by an employee of defendant.

14. Upon information and belief plaintiff was left alone in a stopped vehicle and he fell out of an open door of the vehicle.

15. Upon information and belief defendants' employee or employees were loading plaintiff's wheel chair at the time of the fall into the back of the vehicle, and had left plaintiff unsupervised and unrestrained.

16. As a result of the aforesaid, plaintiff sustained serious, painful and permanent personal injuries as more particularly set forth herein.

17. As a result of the incident aforesaid, plaintiff's injuries included: fractures of the right distal tibia and fibula requiring an open reduction and internal fixation; right calcaneocuboid and subtalar diastases; surgery for removal of hardware right leg, with washout and excision of wound; chronic osteomyelitis; infection; non-union of fractures; non-healing wound; right below the knee amputation and cellulitis of his right leg stump.

Count I

Plaintiff v. Defendants

Negligence

18. Plaintiff incorporates the above paragraphs fully as though the same were set forth here at length:

19. The subject incident was caused solely by the negligence and careless conduct of the defendants, their agents, servants, workmen, contractors, sub-contractors and/or employees in:

- a. failing to use ordinary care and diligence with regard to plaintiff;
- b. failing to exercise reasonable care to protect plaintiff;
- c. failing to properly supervise plaintiff;
- d. failing to have available sufficient personnel and equipment to properly and safely transport plaintiff;
- e. failing to properly train personnel to secure and safely transport plaintiff in a vehicle;
- f. failing to insure that plaintiff was properly seated in the vehicle and seat belt restrained before leaving the plaintiff alone in the vehicle;
- g. failing to monitor plaintiff in the vehicle;
- h. failing to shut the open door of the vehicle once plaintiff was in the vehicle;

- i. failing to have other personnel on hand to supervise and assist plaintiff in the vehicle;
- j. failing to have sufficient personnel on hand to load plaintiff's wheelchair in the vehicle.
- k. failing to warn plaintiff of the open vehicle door, and:
- l. failing to instruct plaintiff to remain seated while his wheelchair was secured;
- m. failing to follow proper policies and procedures regarding the safe transport of residents, including plaintiff, under the care and control of defendants;
- n. violating the rights of plaintiff's decedent as enunciated in 55 Pa. Code, sec 6400.33, Rights of Individual, pertaining to Community Homes for Individuals with an Intellectual Disability;
- o. violating the standards of the Commission of Accreditation of Rehabilitation Facilities.

20. As a result of the incident aforesaid, plaintiff's injuries included: fractures of the right distal tibia and fibula requiring an open reduction and internal fixation; right calcaneocuboid and subtalar diastases; surgery for removal of hardware right leg, with washout and excision of wound; chronic osteomyelitis; infection; non-union of fractures; non-healing wound; right below the knee amputation; cellulitis right leg stump; some or all of which plaintiff has been advised are or may be permanent in nature.

21. As a result of the aforesaid, plaintiff sustained the injuries as described above, together with a severe shock to his nerves and nervous system, some or all of which plaintiff has been advised are or may be permanent in nature.

22. Plaintiff is now more limited with regard to his normal activities of daily living and is less mobile than he was prior to the subject incident.

23. As a result of the accident aforesaid, the plaintiff has undergone great physical pain and mental anguish and he will continue to endure the same for an indefinite time in the future to his great detriment and loss.

24. As a further result of this accident, the plaintiff has been compelled to expend money for medicine and medical care and attention in and about an effort to effect a cure of his injuries, and will be compelled to continue to expend such sums for the same purposes for an indefinite time in the future, to his great detriment and loss.

25. As a further result of this accident, plaintiff suffered an injury which may be in full or part a cosmetic disfigurement which is permanent, irreparable and severe.

WHEREFORE, plaintiff demands judgement against the defendants for damages in excess of \$150,000.00, costs of prosecution, and other such relief as this Court deems just and proper.

Count II

Plaintiff v. Defendants

Corporate Liability

26. Plaintiff incorporates by reference the foregoing paragraphs, inclusive, as though the same were set forth fully and at length herein.

27. Defendants were negligent and careless in connection with the care and treatment of plaintiff as follows:

a. failing to adequately supervise, oversee, coordinate and manage plaintiff's care, treatment and safety while at their facility and in their vehicles;

b. failing to coordinate with its own agents, servants, workers, and/or employees to ensure that plaintiff's care, treatment and safety was properly and adequately supervised, overseen, coordinated and managed to avoid the type of fall that was incurred while he was a resident under defendant's care and control;

c. failing to select, retain, and employ competent staff so as to ensure the proper care, treatment and safety of individuals having medical problems and intellectual disabilities such as those presented by plaintiff;

d. failing to properly train and supervise its agents, servants, employees and workmen regarding the supervision coordination and management of a resident at its facility that it knew or should have known was at increased risk for falling;

e. failing to provide sufficient staff to meet the needs of the residents, including plaintiff, and failing to maintain facilities and vehicles used to transport residents with adequate staff and sufficient resources to prevent the fall as incurred by plaintiff, and;

f. failure to formulate, adopt and enforce adequate rules, procedures and policies to ensure safe transport of residents, including plaintiff, under the care and control of defendant;

g. violating the rights of plaintiff's decedent as enunciated in 55 Pa. Code, sec 6400.33, Rights of Individual, pertaining to Community Homes for Individuals with an Intellectual Disability;

h. violating the standards of the Commission of Accreditation of Rehabilitation Facilities.

28. ReMed defendants had actual and/or constructive notice of the aforesaid failures.

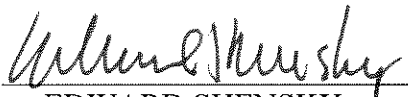
29. Plaintiff's fall and resultant injuries and damages as described and enumerated above, were proximately caused by the aforesaid acts and/or failures to act on the part of defendants.

WHEREFORE, plaintiff demands judgement against the defendants for damages in excess of \$150,000.00, costs of prosecution, and other such relief as this Court deems just and proper.

JURY DEMAND

Plaintiff demands a trial by jury.

STARK & STARK
A Professional Corporation

By: 
EDWARD SHENSKY
Attorney for Plaintiff
I.D. No. 27891
777 Township Line Road
Suite 120
Yardley, PA 19067
267-907-9600
email: eshensky@stark-stark.com